

TABLE OF CONTENTS FOR EXHIBITS FILED IN SUPPORT OF DEFENDANT’S
RESPONSE MOTION FOR PARTIAL SUMMARY JUDGMENT

<u>Exhibit</u>	<u>Exhibit title</u>	DE #¹
A	Statement of Claim in Gagarin Court in Moscow, Russia	DE1
B	Google Search results for (416)456-9875	DE9
C	Defendant’s Second set of Requests for Production	DE12
D	Order of Master Josefo of Superior Court of Justice for Ontario, dated January 24, 2019	DE21
E	Email from Associate Deputy Attorney General Bruce Ohr	DE27
F	Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election (Excerpt)	DE31
G	Report to Congress Pursuant to Section 241 of the Countering America's Adversaries Through Sanctions Act of 2017 Regarding Senior Foreign Political Figures and Oligarchs in the Russian Federation and Russian Parastatal Entities	DE33
H	Interpol Red Notice application	DE43
I	Cyprus Times article “AG denies corruption charges”	DE46
J	Defendant’s First set of Requests for Production	DE51
K	Declaration of Alexey Kondratiev	DE64

¹ Similarly to Plaintiffs’ COE numbering system, the Defendant has adopted a numbering system with letters DE standing for “Defendant’s Exhibits.” Defendant has stamped unique and sequential numbers in the upper right corner of each page of each exhibit, which numbers are used for pincites where necessary to draw the Court’s attention to specific portions within voluminous exhibits.

Exhibit A

M - 5942/2019

В Гагаринский районный суд г. Москвы
(119049, г. Москва, ул. Донецкая, д.11, стр.1)

Заявитель:

Бойко Олег Викторович
(119311, г. Москва, ул. Строителей, д. 13, корп. 5, кв. 8)

ДЛЯ ИЗВЕЩЕНИЙ И ОТВЕТОВ:

адвокат Прохоров Вадим Юрьевич
(105120, Москва, 2-й Сыромятнический пер., д. 10А;
Московская коллегия адвокатов «Межрегион»,
каб. 308; моб. тел. (985) 210-79-84)



78500041 000484032



ЗАЯВЛЕНИЕ

о признании распространенных сведений не соответствующими
действительности

(в порядке особого производства – п. 8 ст. 152 ГК РФ, ч. 2 ст. 262 ГПК РФ)

Заявитель, Бойко Олег Викторович, является известным российским предпринимателем, экономистом, продюсером. Развивает успешные проекты в различных секторах российской и международной экономики.

Заявитель является главной Комитета по развитию паралимпийского движения в России Паралимпийского Комитета России <https://paralymp.ru/about/structure/committees-and-commissions/>, учредителем Фонда поддержки паралимпийского спорта «Параспорт» <http://www.parasport.ru/about/>.

Наличие чести, достоинства и деловой репутации у граждан и право на их защиту презюмируется действующим законодательством – в том числе положениями ст.ст. 150, 152 Гражданского кодекса РФ, абз. 1 п. 1 Постановления № 3 Пленума Верховного Суда Российской Федерации от 24 февраля 2005 г. «О судебной практике по делам о защите чести и достоинства граждан, а также деловой репутации граждан и юридических лиц» (далее – ППВС от 24.02.2005 г.).

Однако, неизвестными лицами, выступающими анонимно, создана Интернет-страница по адресу: <http://olegvboyko.website/> - где распространены сведения, не соответствующие действительности и порочащие честь, достоинство и деловую репутацию заявителя О.В.Бойко (что подтверждается прилагаемым к настоящему Заявлению Протоколом осмотра доказательств (интернет-страницы

<http://olegvboyko.website/>, составленным и удостоверенным нотариусом г. Москвы С.И.Глуховым, с нотариально удостоверенным переводом – Приложение 1).

Правовое обоснование Заявления

В соответствии со статьей 23 Конституции Российской Федерации каждый имеет право на защиту своей чести и доброго имени.

Предусмотренное статьями 23 и 46 Конституции Российской Федерации право каждого на защиту своей чести и доброго имени, а также установленное статьей 152 Гражданского кодекса Российской Федерации право каждого на судебную защиту чести, достоинства и деловой репутации от распространенных не соответствующих действительности порочащих сведений является необходимым ограничением свободы слова для случаев злоупотребления этими правами.

Иски и заявления в суд по делам данной категории вправе предъявить граждане, которые считают, что о них распространены не соответствующие действительности порочащие сведения.

В соответствии с п. 8 ст. 152 Гражданского кодекса РФ:

«Если установить лицо, распространившее сведения, порочащие честь, достоинство или деловую репутацию гражданина, невозможно, гражданин, в отношении которого такие сведения распространены, вправе обратиться в суд с заявлением о признании распространенных сведений не соответствующими действительности».

При этом в соответствии с абз. 3 п. 2 ППВС от 24.02.2005 г.:

«Судебная защита чести, достоинства и деловой репутации лица, в отношении которого распространены не соответствующие действительности порочащие сведения, не исключается также в случае, когда невозможно установить лицо, распространившее такие сведения (например, при ... распространении сведений в сети Интернет лицом, которое невозможно идентифицировать). В соответствии с пунктом 6 статьи 152 Гражданского кодекса Российской Федерации суд в указанном случае вправе по заявлению заинтересованного лица признать распространенные в отношении него сведения не соответствующими действительности порочащими сведениями. Такое заявление рассматривается в порядке особого производства (подраздел IV Гражданского процессуального кодекса Российской Федерации)».

В соответствии с ч.ч. 1 – 2 ст. 262 ГПК РФ в порядке особого производства суд рассматривает как дела, указанные в пунктах 1 – 11 ч. 1 ст. 262 ГПК РФ, так и другие дела, отнесенные федеральными законами к рассмотрению в порядке особого производства. В данном случае такой нормой федерального закона, относящей данное дело к рассмотрению в порядке особого производства, является

вышеуказанное положение п. 8 ст. 152 Гражданского кодекса РФ (в том числе с учетом соответствующего разъяснения в абз. 3 п. 2 ППВС от 24.02.2005 г.).

В соответствии с вышеуказанными разъяснениями Пленума Верховного Суда Российской Федерации **не соответствующими действительности** сведениями являются утверждения о фактах или событиях, которые не имели места в реальности во время, к которому относятся оспариваемые сведения (абз. 4 п. 7 ППВС от 24.02.2005 г.).

Порочащими, в частности, являются сведения, содержащие утверждения о нарушении гражданином действующего законодательства, совершении нечестного поступка, неправильном, неэтичном поведении в личной, общественной или политической жизни, недобросовестности при осуществлении производственно-хозяйственной и предпринимательской деятельности, нарушении деловой этики или обычаев делового оборота, которые умаляют честь и достоинство гражданина или деловую репутацию гражданина (абз. 5 п. 7 ППВС от 24.02.2005 г.).

Под **распространением сведений**, порочащих честь, достоинство и деловую репутацию граждан, следует понимать опубликование таких сведений в печати, трансляцию по радио и телевидению, **распространение в сети Интернет** (абз. 2 п. 7 ППВС от 24.02.2005 г.).

Из содержания данного сайта невозможно установить лицо, распространившее размещенные на нем сведения.

Не соответствующие действительности порочащие сведения, распространенные именно в отношении заявителя О.В.Бойко.

На вышеуказанном Интернет-сайте <http://olegvboyko.website/> распространены, в частности, следующие порочащие сведения в отношении Заявителя О.В.Бойко, не соответствующие действительности:

1. *«В течение всего этого периода прослеживаются два очевидных момента. Первый – его постоянная склонность быть вовлеченным в незаконную деятельность – в основном финансовые преступления, которая ничуть не уменьшилась со временем»* (раздел А, стр. 1 нотариально заверенного перевода Интернет-страницы – Приложение 1).

2. *«Его основной корпоративный актив, ОЛБИ, насчитывающий около шестидесяти компаний, был вовлечен в финансовые преступления с использованием схем Понци (*финансовая пирамида), предпринятым «ОЛБИ-Дипломат», а также занимался отмыванием денег»* (раздел А, стр. 1).

3. *«Крах банка и раскрытие схем Понци привели к возбуждению уголовного дела против Бойко и связанных с ним лиц....обвинение против Бойко остается в его личном деле»* (раздел А, стр. 2).

4. «Бойко занимался рейдерскими захватами, будучи председателем и акционером Евразхолдинга (с 1998 по 2004)» (раздел А, стр. 2).

5. «Бойко, банк «Национальный Кредит», и его компания OLBI-USA участвовали в отмыывании более ста миллионов долларов, полученных мошенническим путём, что привело к краху Бангкокского коммерческого банка в 1994-м. Это в свою очередь привело к возникновению азиатского финансового кризиса в 1998 году» (раздел А, стр. 2)..

6. «Бойко занимался корпоративным рейдерством в США в отношении игровой компании «Cadillac Jack» (раздел А, стр. 2)

7. «Участие Бойко в финансировании голливудских фильмов является отмыыванием денег» (раздел А, стр. 2).

8. «...Заявление особенно иронично, учитывая финансовые мошенничества и отмыывание денег, которыми Бойко занимался в то время в то время с ОЛБИ и банком «Национальный кредит»» (раздел В7, стр. 8 – 9).

9. «Бойко и Абрамов вместе организовали захват Нижнего Тагила, приведя его в состояние банкротства, а затем захватив контроль над предприятием; типичный для России прием корпоративного рейдерства с использованием коррумпированных судов. В дальнейшем Абрамов и Бойко повторили эту схему ещё с несколькими предприятиями» (раздел С1, стр. 10).

10. «Будучи директором ОАО «ОЛБИ-Дипломат» Бойко О.В. подписал с г-ном Горшковым договор на покупку и продажу ценных бумаг из чекового инвестиционного фонда «Хранитель». По условиям договора Горшков приобретал акции «ОЛБИ-Дипломат» и с этой целью Бойко получил от Горшкова деньги. Однако сделал он это обманным путем» (раздел С3, стр. 13).

11. «Инвестиции Бойко в фильмы Голливуда через Finstar также являются явным отмыыванием денег» (раздел С6, стр. 17) .

Приведенные выше фрагменты №№ 1, 2, 3, 5, 7, 8, 9, 11 содержат прямые утверждения о нарушении Заявителем О.В.Бойко действующего законодательства и совершении преступлений – что полностью соответствует критерию отнесения распространенных сведений о Заявителе к порочащим в соответствии с п. абз. 5 п. 7 ППВС от 24.02.2005 г.

Приведенные выше фрагменты №№ 4, 6, 10 содержат утверждения о недобросовестности Заявителя О.В.Бойко при осуществлении производственно-хозяйственной и предпринимательской деятельности, нарушении деловой этики и обычаев делового оборота – что полностью соответствует критерию отнесения распространенных сведений о заявителе к порочащим в соответствии с п. абз. 5 п. 7 ППВС от 24.02.2005 г.

Необходимо отметить, что приведенными выше оспариваемыми фрагментами текста с Интернет-сайта <http://olegyboyko.website/> отнюдь не исчерпываются распространенные на нем в отношении Заявителя О.В.Бойков не соответствующие действительности порочащие сведения. Однако, в настоящем Исковом заявлении приведены наиболее характерные из них.

Приложенные к настоящему Исковому заявлению документы, которые не являются подлинниками либо надлежащим образом заверенными копиями, будут представлены в виде подлинников либо надлежащим образом заверенных копий в судебном заседании либо в ходе подготовки дела к судебному разбирательству.

Учитывая изложенное и в соответствии с положениями ст.ст. 12, 150 – 152, Гражданского кодекса Российской Федерации, Постановлением № 3 Пленума Верховного Суда Российской Федерации от 24 февраля 2005 г. «О судебной практике по делам о защите чести и достоинства граждан, а также деловой репутации граждан и юридических лиц»

ПРОШУ

Признать не соответствующими действительности следующие порочащие сведения, распространенные в отношении истца Бойко Олега Викторовича в сети Интернет на странице с адресом: <http://olegyboyko.website/>

1. «В течение всего этого периода прослеживаются два очевидных момента. Первый – его постоянная склонность быть вовлеченным в незаконную деятельность – в основном финансовые преступления, которая ничуть не уменьшилась со временем».

2. «Его основной корпоративный актив, ОЛБИ, насчитывающий около шестидесяти компаний, был вовлечен в финансовые преступления с использованием схем Понци (*финансовая пирамида), предпринятым «ОЛБИ-Дипломат», а также занимался отмыванием денег».

3. «Крах банка и раскрытие схем Понци привели к возбуждению уголовного дела против Бойко и связанных с ним лиц...обвинение против Бойко остается в его личном деле».

4. «Бойко занимался рейдерскими захватами, будучи председателем и акционером Евразхолдинга (с 1998 по 2004)».

5. «Бойко, банк «Национальный Кредит», и его компания OLBI-USA участвовали в отмывании более ста миллионов долларов, полученных мошенническим путём, что привело к краху Бангкокского коммерческого банка в 1994-м. Это в свою очередь привело к возникновению азиатского финансового кризиса в 1998 году».

6. «Бойко занимался корпоративным рейдерством в США в

отношении игровой компании «Cadillac Jack».

7. «Участие Бойко в финансировании голливудских фильмов является отмыванием денег».

8. «...Заявление особенно иронично, учитывая финансовые мошенничества и отмывание денег, которыми Бойко занимался в то время с ОЛБИ и банком «Национальный кредит»».

9. «Бойко и Абрамов вместе организовали захват Нижнего Тагила, приведя его в состояние банкротства, а затем захватив контроль над предприятием; типичный для России прием корпоративного рейдерства с использованием коррумпированных судов. В дальнейшем Абрамов и Бойко повторили эту схему ещё с несколькими предприятиями».

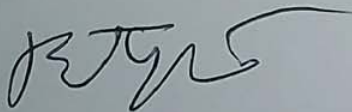
10. «Будучи директором ОАО «ОЛБИ-Дипломат» Бойко О.В. подписал с г-ном Горшковым договор на покупку и продажу ценных бумаг из чекового инвестиционного фонда «Хранитель». По условиям договора Горшков приобретал акции «ОЛБИ-Дипломат» и с этой целью Бойко получил от Горшкова деньги. Однако сделал он это обманным путем».

11. «Инвестиции Бойко в фильмы Голливуда через Finstar также являются явным отмыванием денег».

Приложения:

1. Протокол осмотра доказательств (интернет-страницы <http://olegvboyko.website/>), составленный нотариусом г. Москвы С.И.Глуховым 21 августа 2019 года – с нотариально удостоверенным переводом.
2. Квитанция об уплате Заявителем государственной пошлины.
3. Копия доверенности на В.Ю.Прохорова.

Представитель Заявителя О.В.Бойко
(по доверенности)



В.Ю.Прохоров

02 октября 2019 года

город Москва

городской
районныйГАГАРИНСКИЙ
(наименование суда)

суд

Уголовное
Гражданское,
Административное
дело7 2-5855/2019
дело №По обвинению
иску (заявлению),
административному
исковому
заявлениюпо заявлению Бойко Олега Викторовича о признании распространенных сведений не
соответствующими действительности

1 инстанция

Поступило
Рассмотрено

2 инстанция

Поступило
Рассмотрено

03.12.19 14.30 P

26.12.19 14.00

Сдано в архив
Архивный номер

2-5855/2019

Exhibit B



(416)456-9875



All

Maps

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Tools

About 9 results (0.46 seconds)



45.79.187

http://45.79.187.117 › srci › 416 › mid

416-456-98## (Toronto, ON) - The Feed Foundation

416-456-9875 | (+1 4164569875) in Toronto (ON)More Info ->. 416-456-9829 | (+ ... 416-456-9850 | (+1 4164569850) in Toronto (ON)More Info ->. Recent Feedback ...



CourtListener

https://www.courtlistener.com › docket › boyko-v-kondr...

Parties for Boyko v. Kondratiev, 2:23-cv-01186

Jun 27, 2023 — Alexey Kondratiev. **(416) 456-9875**. Alexey Kondratiev 3045 16th Sideroad King City, Canada,. olegvboyko.website. Plaintiff. Finstar-Holding LLC.



Oleg Boyko Unmasked

https://www.olegvboyko.website › affidavit PDF

Affidavit of Alexey Kondratiev

May 8, 2019 — Alexey Kondratiev. Smart Games Canada, Inc. 3045 16th Sideroad. King City, ON L7B1A3. **(416) 456-9875**. Defendants (Plaintiffs by Counterclaim)

11 pages



California Department of Food and Agriculture (.gov)

https://www.cdffa.ca.gov › pdfs › CFM-CertifiedPr... PDF

Certified Producers by County as of December 1, 2023

Feb 7, 2023 — (442) **456-9875**. 2/3/2023. 2/2/2024. Humboldt. Tulio Guarnieri -. Laura ... (502) **416-6288**. 8/30/2023. 8/29/2024. Humboldt. Reyna C Bonilla. Reyna ...

12 pages



Part Target

https://fsg-53-rivets-fasteners-gasket.parttarget.com › pac...

Packing and Gasket Materials: 10116952, 10116977, 10116982

5330-01-**416**-0198, Seal, Nonmetallic Strip, End Item Identification: Used on F ... 5330-01-**456-9875**, Packing, Preformed, End Item Identification: F404 engine



Hill Country Portal

https://www.hillcountryportal.com › hillcountryhun...

Hunting & Fishing In Texas (TX) Hill Country

WHITWORTH BROTHERS: 325-**456-9875**; 1000 S Church, Brady, TX 76825. Deer ... **416** Earl Garrett St, Kerrville, TX 78028. HAMMACK'S TAXIDERMY & TANNERY: 830-895 ...



google.ca

https://books.google.ca › books

Foreign Commerce and Navigation of the United States

United States. Bureau of the Census · 1912 · Commercial statistics

... **456 9,875** 18,552 **416** 34 , 239 24 , 813 110 10,465 31 , 660 8,141 39,253 153 11,883 36 , 145 Hongkong .. 218 1,690 Japan .. 1,130 405 Turkey in Asia . 37 ...



Oleg Boyko Unmasked

Affidavit of Alexey Kondratiev

Alexey Kondratiev. Smart Games Ca L7B1A3. (416) 456-9875. Defendant:

Share

About this result

Source

www.olegvboyko.website was first

More about this page

Not personalized

A result is only personalized when Google Account activity. [Learn more](#)

Privacy settings

Manage personal results

Your search & this result


- These search terms appear in t
- A term related to your search a
- The result is in English
- This result seems relevant for s Canada

How Search works

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This is a search result, not an ad. C labeled with "Sponsored" or "Ad."

Send feedback

 OEIS
https://oeis.org › ...

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... 416 36 417 54 418 72 419 42 420 144 421 50 422 64 423 82 424 56 425 84 426 ... 456 9875
540 9876 696 9877 592 9878 592 9879 592 9880 632 9881 388 9882 900 ...

 FastPeopleSearch.com
https://www.fastpeoplesearch.com › address › po-box-...

People Living at Po Box 15, Three Rivers MA 01080

(201) 456-9875 · (413) 289-1780 · (413) 283-6970 · (818) 509-1048. AKA: Alias ... (763)
416-6517 · (508) 740-9666 · (413) 592-5418. AKA: Alias, Nicknames, ...

 ClustrMaps
https://clustrmaps.com › US Persons › C

Steven Canady - Public Records

(702) 456-9875. View Details · Steven C Canady, age 74. View Details ... (501) 416-1555. View
Details · Steven Canady · View Details. Joliet. 1526 ...

Canada

L7B 1A3, King, ON - Based on your places (Home) - Update location

More options in Quick settings (⚙)

Exhibit C

ALEXEY KONDRATIEV
3045 16th Sideroad,
King City, Ontario L7B1A3
Canada

Pro Se Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Oleg Boyko, et al.

Plaintiffs,

v.

Alexey Kondratiev, et al.

Defendants.

No. CV-23-01186-PHX-DLR

**DEFENDANT'S SECOND SET OF
REQUESTS FOR PRODUCTION
TO THE PLAINTIFF OLEG
BOYKO AND FINSTAR
HOLDING LLC**

Pursuant to Federal Rules of Civil Procedure ("FRCP") 26 and 34, Defendant Alexey Kondratiev hereby requests that the Plaintiffs Oleg Boyko and Finstar Holding LLC produce for inspection and copying the following documents and things at his residence at 3045 16th Sideroad, Ontario, Canada L7B1A3, in accordance with the Definitions and Instructions set forth below. Responses to these requests must be produced within thirty (30) days after service in accordance with FRCP 34.

DEFINITIONS

Except as specifically defined below, the terms used in these requests shall be construed and defined in accordance with the FRCP, wherever applicable. Any terms not defined shall be given their ordinary meaning.

1 1. The term “Answer” means the Answer filed by the Defendant on August 9,
2 2023, in the above-captioned action (ECF No. 24).

3 2. The term “Communication(s)” means the transmittal, transfer, offer, or
4 exchange of information (in the form of facts, ideas, inquiries, or otherwise) by any
5 means, and shall include, without limitation, text messages in any format (e.g., SMS,
6 MMS, iMessage, etc.).
7

8 3. The term “Complaint” means the complaint filed on June 27, 2023, in the
9 above-captioned action (ECF No. 1).
10

11 4. The terms “Concerning,” “Reflecting,” “Regarding,” and “Related To” mean
12 analyzing, describing, discussing, constituting, containing, considering, embodying,
13 evaluating, mentioning, memorializing, supporting, collaborating, demonstrating,
14 proving, evidencing, showing, refuting, disputing, rebutting, controverting, contradicting,
15 pertaining to, made in connection with or by reason of, or derived or arising therefrom, or
16 being in any way legally, logically, or factually concerned with the matter described,
17 referred to, or discussed.
18

19 5. The term “Document(s)” is synonymous in meaning and scope to the term
20 “document” as used in FRCP 34, including “writings” and “recordings” as defined in
21 Federal Rule of Evidence 1001. It includes, but it not limited to, all written, printed,
22 typed, recorded or graphic matter, however produced or reproduced, of every kind and
23 description, in whatever form (e.g., final and draft versions) in your actual or constructive
24 possession, custody, care or control, including without limitation all writings,
25 correspondence, e-mails, letters, telegrams, notes, mailgrams, cellphone texts, agenda,
26
27
28

1 memoranda, inter-office communications, reports, forecasts, projects, analyses, working
2 papers, charts, requests for authorization, expense account reports, charge or credit
3 account vouchers, calendars, appointment books, diaries, drawings, graphs, photographs,
4 sound reproduction tapes, data compilations from which information can be obtained or
5 can be translated through detection devices into reasonably useable form, computer
6 inputs or outputs, or any other tangible thing. The term “Document(s)” includes not only
7 originals, but also any copies or reproductions upon which notations in writing, print, or
8 otherwise have been made which do not appear in the original.

11 6. The term “Person” means any individual, corporation, partnership, firm,
12 association, government agency, or other organization recognizable at law, including its
13 present and former officers, members, managers, directors, partners, employee,
14 independent contractors, agents, accountants, representatives, and attorneys.

16 7. The terms “You” and “Your” mean Plaintiffs Oleg Boyko and Finstar Holding
17 LLC, their agents, employees, representations, successors, predecessors, attorneys, and/or
18 anyone acting or purporting to act on his behalf.

20 INSTRUCTIONS

21
22 1. You shall produce materials and serve responses and any objections on
23 Defendant within 30 days after service of these requests for production.

24 2. Pursuant to FRCP 34(b)(2)(B) and (C), if you object to any part of a request, set
25 forth the basis for your objection and respond to all parts of the request to which you do
26 not object. All objections must be noted with specificity. Any ground not stated in a
27 timely objection is waived.
28

1 3. With respect to any document withheld on a claim of privilege or work product
2 protection, provide a written privilege log identifying each document individually and
3 containing all information required by FRCP 26(b)(5), including a description of the
4 basis of the claimed privilege and all information necessary for Defendant to assess the
5 claim of privilege.
6

7 4. In accordance with the FRCP, the scope of discovery sought through these
8 requests for production extends to all relevant and non-privileged materials that might
9 reasonably lead to the discovery of admissible evidence. You should produce all
10 documents available to you or subject to your access or control that are responsive to the
11 requests for production. This includes documents in your actual or constructive
12 possession or control, as well as any non-privileged information in the actual or
13 constructive possession or control of your attorneys, investigators, experts, agents, and
14 any other persons acting on your behalf.
15
16

17 5. Documents are to be produced as they are kept in the ordinary course of
18 business. Accordingly, documents should be produced in their entirety, without
19 abbreviation, redaction, or expurgation; file folders with tabs or labels identifying
20 documents responsive to this request should be produced intact with the documents; and
21 documents attached to each other should not be separated.
22
23

24 6. Subject to any Electronically Stored Information order subsequently entered in
25 this case, all documents are to be produced in electronic form pursuant to these
26 instructions. All documents, including emails, should be produced in single page .TIFF
27 format, showing comments and track changes where applicable, with text extract and
28

1 database load files containing standard fielded information and metadata. .TIFF images
2 shall be placed in an Images folder with any given subfolder not to exceed 5,000 images
3 per folder and accompanied by an .opt and .dat load files placed in a Data folder. If files
4 are produced in native format, those natively-produced documents should be
5 accompanied by a placeholder and OCR/extracted test file. Each page of a document
6 should be assigned a unique production number (aka Bates number) electronically
7 “burned” onto the image at a location that does not unreasonably conceal or interfere with
8 information on the document. The Bates numbering convention should be consistent
9 across the production, contain no special characters, and be numerically sequential within
10 a given document. Attachments to documents should be assigned numbers that directly
11 follow in sequential order the Bates numbers on the documents to which they were
12 attached. If a number or set of numbers is skipped, the skipped number or set of numbers
13 should be noted, for example with a placeholder.

14
15
16
17
18 7. If there are no documents responsive to a particular request, so indicate in your
19 response.

20
21 8. If any otherwise responsive document was, but is no longer, in existence or in
22 your possession, custody, or control, identify the type of information contained in the
23 document, its current or last known custodian, the location/address of such document,
24 and the identity of all persons having knowledge or who had knowledge of the document,
25 as well as describe in full the circumstances surrounding its destruction, loss, or other
26 disposition from your possession or control.

27
28 9. These requests for production are continuing in nature, up to and during trial.

1 Materials sought by these requests for production that become available after you serve
2 your responses must be disclosed to Defendant by supplementary response or responses.

3 10. Pursuant to FRCP 26(e), you are under a duty to promptly supplement or
4 correct your responses to these requests for production if you learn that an answer is in
5 some material respect incomplete or incorrect. If you expect to obtain further information
6 or expect the accuracy of a response given to change between the time responses are
7 served and the time of trial, you should state this fact in each response. Supplementary
8 answers are to be served upon Defendant as soon as practicable after you receive this new
9 information, but, in any event, no later than 14 days after its receipt.
10

11 11. If you contend that it would be unreasonably burdensome to obtain and
12 provide all of the documents called for in response to any document request or any
13 subsection thereof, then in response to the appropriate document request: (a) produce all
14 such documents as are available to you without undertaking what you contend to be an
15 unreasonably burdensome effort; (b) describe with particularity the efforts made by you
16 or on your behalf to produce such documents, including identification of persons
17 consulted, description of files, records and documents reviewed, and identification of
18 each person who participated in the gathering of such documents, with specification of
19 the amount of time spent and the nature of work done by such person; and (c) state with
20 particularity the grounds upon which you contend the additional efforts to produce such
21 documents would be unreasonably burdensome.
22

23 12. The singular shall be read to include the plural and vice versa, the gender of a
24 pronoun (masculine, feminine, or neutral) shall not exclude the other genders, the present
25
26
27
28

1 tense shall be read to include the past tense and vice versa, the term “each” shall be read
2 to include the term “every” and vice versa, the term “any” shall be read to include the
3 term “all” and vice versa, and the term “and” shall be read to include the term “or” and
4 vice versa, so as to encompass the broadest possible interpretation for each request.
5

6 REQUESTS FOR PRODUCTION

7 REQUEST FOR PRODUCTION NO. 1:

8 All Documents, including communications, related to Legal action Case No.
9 C30431519, C-3415-19/20 in the Vidzeme District Court in Madona, Latvia.
10

11 REQUEST FOR PRODUCTION NO. 2:

12 All Documents, including communications, with the web site
13 <www.kompromat.lv>, LLC “PR SOLUTIONS LV” and Leonids Jacobsons.
14

15 REQUEST FOR PRODUCTION NO. 3:

16 All Documents, including communications, related to the legal action of Mr.
17 Boyko against Google LLC in Moscow, Russia, particularly, but not limited to, the Court
18 file numbers 02-5855/2019 ~ M-5942/2019, 02-5983/2021, 02-0315/2021, 02-4379/2020
19 ~ M-3761/2020, 33-16027/2023, 33-17819/2022 and 33-27498/2022.
20

21 REQUEST FOR PRODUCTION NO. 4:

22 All Documents, including communications, that were exchanged with Google
23 LLC regarding <olegvboyko.website>.
24

25 REQUEST FOR PRODUCTION NO. 5:

26 All Documents, including communications, that were exchanged with any third
27 party regarding <olegvboyko.website>.
28

1
2 Dated January 30, 2024

3 By: /s/ Alexey Kondratiev
4 Alexey Kondratiev
5 *Pro Se Defendant*
6
7
8

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on this 30th day of January 2024, I served a copy of
11 Defendant's Second Set of Requests for Production on the Attorneys for Plaintiffs Oleg
12 Boyko and Finstar-Holding LLC via electronic mail – from my e-mail address
13 <akondratiev@mac.com> to the following e-mail addresses:

14 <astolyar@loeb.com>

15 <dbeddingfield@loeb.com>

16 <jmargolis@loeb.com>

17 <amy@fennemorelaw.com>

18 <bgilmore@fennemorelaw.com>
19

20 By: /s/ Alexey Kondratiev
21 Alexey Kondratiev
22
23
24
25
26
27
28

Exhibit D

Court File No. CV-08-354560

**ONTARIO
SUPERIOR COURT OF JUSTICE**

MASTER)	THURSDAY, THE 24 TH
)	
JOSEFO)	DAY OF JANUARY, 2019

B E T W E E N:

ARCÁDIA PARTICIPAÇÕES LTDA.

Plaintiff/
Defendant to the Counterclaim

- and -

ALEXEY KONDRATIEV and SMART GAMES CANADA, INC.

Defendants/
Plaintiffs by Counterclaim

- and -

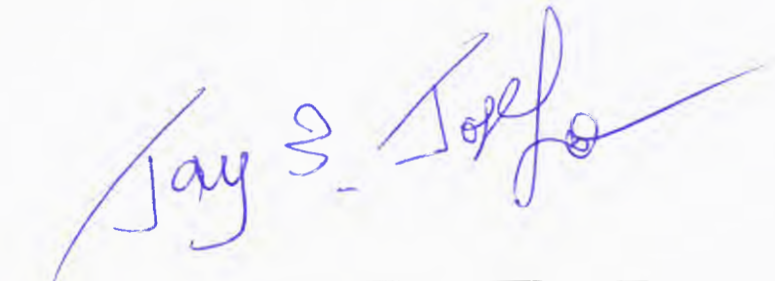
EUGENE CHAYEVSKY, ADENILTON CEZAR XAVIER, CADILLAC JACK, INC.,
FINSTAR FINANCIAL GROUP LLC, TILLEY INTERNATIONAL & ASSOCIATES
INC., carrying on business as Tilley Entertainment
Defendants to the Counterclaim

ORDER

THIS MOTION, made by Defendants (Plaintiffs by Counterclaim) Alexey Kondratiev and Smart Games Canada, Inc. (the "Moving Parties"), for an order to set a new deadline for setting this action down for trial, was heard on January 24, 2019 at the Court House, 393 University Avenue, Toronto, Ontario, M5G 1E6.

ON READING the Motion Record, Supplementary Motion Record, Factum, and Book of Authorities of the Moving Parties, the Motion Record, Factum, and Book of Authorities of the Responding Parties, Arcadia Participacoes Ltda., Eugene Chayevsky, Adenilton Cezar Xavier, Finstar Financial Group LLC, and Tilley International & Associates Inc. carrying on business as Tilley Entertainment, and the Factum, Book of Authorities, and Transcript Brief of the Responding Party, Cadillac Jack, Inc., and on hearing the submissions of the lawyers for the parties,

1. **THIS COURT ORDERS** that the parties adhere to the timetable attached at Schedule "A". This timetable is final and shall not be extended further.
2. **THIS COURT ORDERS AND DIRECTS** that pursuant to Rule 48 the Registrar shall dismiss this action for delay unless the action has been set down for trial or terminated by any means on or before the new deadline for setting the action down for trial, which shall be *pursuant to the applicable option in the attached schedule "A" timetable.*
3. **THIS COURT ORDERS** that the parties bear their own costs of this Motion.



Master Josefo

SCHEDULE "A"

TIMETABLE

Service of motion record in support of request to amend pleadings in this action (" Pleading Amendment Motion ")	Defendants/plaintiffs by counterclaim: May 15, 2019 31
Service of motion record in respect of paragraph 39 of the statement of claim and consolidation of Toronto SCJ action no. CV-15-537434 commenced by the defendants/plaintiffs by counterclaim against Oleg Boyko (" Boyko Motion ")	Defendants/plaintiffs by counterclaim: May 15, 2019 31 <i>return dates</i> <i>deadline for final disposition of above - noted motions (including final disposition of any appeal and expiry of any applicable limitation period):</i>
Delivery of further defences	<p>From final disposition of Pleading Amendment Motion (including the final disposition of any appeal and the expiry of any applicable appeal period):</p> <p>+30 days for existing parties to action</p> <p>+40 days from service of amended claim on any new defendant based in Canada (outside Ontario) or the US</p> <p>+60 days from service of amended claim on any new defendant based outside of Canada or the US</p> <p>From final disposition of Boyko Motion (including the final disposition of any appeal and the expiry of any applicable appeal period):</p> <p>+60 days from service of amended claim on Mr. Boyko outside of Canada or the US</p>
Delivery of reply (if any)	+10 days from delivery of last defence
Delivery of affidavits of documents and productions	+3 months from delivery of reply

Conduct examinations for discovery	+3 months from delivery of all affidavits of documents
Mandatory mediation	+4 months from final examination for discovery
Set down deadline	March 30, 2020, peremptory

If the plaintiffs by counterclaim do not file materials in support of the above-noted motions by the prescribed deadlines, the following deadlines shall apply:

Delivery of affidavits of documents and productions

- Defendants/plaintiffs by counterclaim: June 30, 2019
- Remaining parties: July 31, 2019

Conduct examinations for discovery: September 30, 2019
(subject to above deadlines first being met)

Mandatory mediation: December 30, 2019
(subject to above deadlines first being met)

Set Down deadline: December 31, 2019

all deadlines herein are peremptory on the ~~plaintiffs~~/
defendants/plaintiffs by counterclaim,

ARCÁDIA PARTICIPAÇÕES LTDA. -and-
Plaintiff/Defendant to the
Counterclaim

ALEXEY KONDRATIEV et al.
Defendants/Plaintiffs by
Counterclaim

Court File No. CV-08-354560

ONTARIO

SUPERIOR COURT OF JUSTICE

Proceeding commenced at Toronto

ORDER

BLAKE, CASSELS & GRAYDON LLP
Barristers & Solicitors
199 Bay Street, Suite 4000
Toronto ON M5L 1A9

R. Seumas M. Woods LSO #301691
Tel: 416-863-3876
seumas.woods@blakes.com

Max Shapiro LSO #60602U
Tel: 416-863-3305
Fax: 416-863-2653
max.shapiro@blakes.com

Lawyers for the Defendant by Counterclaim,
Cadillac Jack, Inc.

Exhibit E

Document ID: 0.7.17531.5872

From: Bruce Ohr (b)(6)
To: Ohr, Bruce (ODAG) </o=usdoj/ou=exchange
administrative group (fydibohf23spdlt)/cn=recipients/cn=ohr,
bruce6ca>
Cc:
Bcc:
Subject:
Date: Mon Dec 05 2016 15:47:51 EST
Attachments: ATT00001.txt
WhosWho19Sept2016.xlsx

Last Name (English)	First Names (English)	Last Name (Cyrillic)	First Names (Cyrillic)	Linked with	Who/what	Contact info	Sources/cites/notes
Abernathy	Frank	Абернати	Франк	Millian	"Spiritual Diplomacy"; anti-Tymoshenko; anti-Svoboda; pro-Yanukovych; shady businesses; Pedry Mining Development Corporation (visa mill) with Millian and Abernathy.	(b)(6) (same office as Millian??)	25Jun16
Ablyazov (Abliazov)	Mukhtar	Аблязов	Мухтар	Khrapunov	Ex-BTA bank head, fled in 2009; scandals in multiple countries; in France, may be extradited to Russia or Kazakhstan; Ruslan Tsarni (uncle of Boston Bombers) helped him by testifying on corruption of Nazarbayev son-in-law; co-owned Eurasia Tower with Pavel Fuchs (Tekhinvest);		12Feb16Report
Abramovich	Roman	Абрамович	Роман	Trump?	Ivanka is a friend of Roman's "wife" Darya Zhukova (whose father has crime ties); Jewish Tolerance Center housed on their Garazh arts building.		12Feb16Report
Agalarov	Aras (Araz) Iskender ogly	Агаларов	Арас (Араз Искендер оглы, Araz İsgəndər oğlu)	Trump	Crocus group; Nobu restaurants in Moscow (with Robert DeNiro); Ikhmet Mukhtarov shot in gangland killing in car of Crocus cofounder Rail Zeynalov; Crocus allegedly invested in Solntsevo Group-controlled bank; coinvested with Telman Ismailov in Cherkizovo market; no-bid contract for Kyrgyz customs posts; first customer for Giorgi Rtskhelidze’s and Georgiy Ramishvili’s Silk Road Group SA's J.Lo fashion line. Hosted 2013 Miss Universe pageant.		14Dec15Report;
Agalarov	Emin (Emmin) Arasovich (Arazovich)	Агаларов	Эмин Арасович (Эмин Арас оглы , Emin Araz oğlu)	Trump	B. 1979 Baku; Crocus group First VP; singer; was married to Layla Aliyeva (Azerbaijan president's daughter) 2006-2015; friend of singer Grigory Leps (Lepsveridze), on US Treasury OFAC "Brothers' Circle" blacklist; close to singer Ketі (Ketevan) Topuria, daughter of crime figure.		
Akdeniz	Gündüz	Ақдениз	Гундуз, Гюндюз	Arif	Together with Musa Çelik, suspected of being the main organizers with Tefvik of the 2010 Savarona yacht orgy		17Jun16Report
Akhmetov	Rinat	Ахметов	Ринат	Arif, Manafort	Said to co-own Rixos hotels 2005-2006; used Manafort PR 2005-6; accused of money laundering, financial fraud; straddles fence in Ukraine 2014ff; major Donbass employer (coal); supported Party of Regions and its successor, Opposition Bloc		14Dec15Report; 14Apr16Report
Altshul (Altsoul, Altshoul)	Alexander (Aleksandr, Alex)	Альтшул	Александр	Trump?	Had address in Trump Plaza Panama City; defended Guzman and DMG; from Belarus; alleged mob ties (Canadian lawsuit)		12Feb16Report
Arif (Arifov, Arifova, Airfova, Aris)	Gulnara (Gioulnara, Gulya, or Julia)	Ариф (Арифова)	Гюльнара, Юлия [check] , Гульнара	Arif	Owned Emmons Realty		14Dec15Report

Arif (Arifov)	Tevfik (Tofik, Tevic, Taufik, Tevfic, Tevfi) Murtazayevich	Ариф (Арифов)	Тевфик (Тофик, Тевфик)	Trump	Bayrock; Rixos Hotels; Doyen Capital (soccer players, ores, coal, petrol, maritime transport, real estate, financial advice and investing); alleged to be Uzbek mafia don 1990s; linked with Gafur Rakhimov, Salim Abdullayev/Abduvaliyev, Chernoy; organized 2010 yacht orgy for ENRC's Mashkevich. Guests included Kazakh amb. Saudabayev, Telman Ismailov etc. 2005 Birthday guests included crime-linked Kikalishvili, Bure, Shustorovich, Erdogan. An ethnic Meskhetian Turk alleged to have grown up in Soviet Uzbekistan, then to Kazakhstan in the 1990s. Curaçao-based Ravana holding (with sons/brothers Refik, Efendi and Kemal) invests in chrome, coal, petrol, financial advice, investment, according to Football Leaks. Aktyubinsk Chromium Compounds Plant is run by brother Refik.	(b)(6) 2027 Emmons Ave., Brooklyn (realty co.)	23Nov15Report; 14Dec15Report, 13Feb16Report; 27May16Report; 17Jun16Report; 24Jun16Report; 9Jul16Report
Avrashov	Lee (Leonid Aleksandrovich)	Аврашов	Леонид Александрович	Manafort	Head of Black, Manafort in St Petersburg in 2007. Montfort [Monfort] International Inc.; ConAgra; Skylink Aviation/ Skylink Air and Logistic Support (VP) ; QAM Inc.; Asia Flight Support. Has written reports on espionage, consulted USDA,	see 6Jul16 report for various addresses	6Jul16Report
Bazhayev (Bazhaev)	Musa	Бажаев	Муса	Arif	Ethnic Chechen Moscow developer; Attended 2010 yacht orgy; in semi-disgrace; helped Shumkov [who was found hanging in Moskva-siti's Federation Tower Dec 8 2015] acquire Moscow real estate but later cooled to him. Bazhayev is the largest stake holder in Alliance Oil and Russian Platinum		23Nov15Report; _http://www.rosPRES.com/politics/16741/
Borokhovich (Borokhozich)	Eugene (Eugene, aka Gennady)	Борохович	Евгений/ Геннадий	Arif	Worked with Gulnara Arifova in Emmons Realty; alleged land scam in Texas with Vitaly Zaretsky; with wife Elena, runs the Borokhovich Foundation		12Feb16Report
Boyko (Boiko)	Oleg Viktorovich	Бойко	Олег Викторович	Trump Tower, Agalarov	Finstar, Finstroy, Olbi Concern, Ritzio Entertainment, National Credit Bank, Polnamon, Omteks. EvrazHolding until 2004. Alleged links with Orekhovo and Solntsevo crime groups; Fashion TV stockholder; mystery US partner; prostitute honey-traps; partner Belotserkovskiy and Miss Universe; Hollywood film producer (money laundering?). Friends in Russian government and special services. Finstar sold Trump Tower apt 63AB, used in Nahman-Trincher gambling ring, to Elena Trincher.		10Jun16Report
Buryak (Buriak)	Dmitriy (Dmitry, Dmitri, Dmytro)	Буряк	Дмитрий, Дмитро	Trump	DeVision Company; met with Donald Jr. in Kyiv, June 2008 and in NYC; discussed Euro Park hotel project and golf club		

Exhibit F

Excerpt from the partially declassified “*Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election*”, Volume V, page 645

[REDACTED] Additionally, as of 2017, Geovanis served on the Supervisory Board of 4Finance, a company based in Latvia that is controlled by Russian oligarch Oleg Boyko.⁴²⁰¹ Boyko has concerning ties to the Russian government, to Russian intelligence and security services, and to organized crime. [REDACTED]

[REDACTED] Moldovan press has reported that Boyko was involved in a Kremlin-backed foreign election influence operation there.⁴²⁰³

Exhibit G

UNCLASSIFIED

**Report to Congress Pursuant to Section 241 of the
Countering America's Adversaries Through Sanctions Act of 2017
Regarding Senior Foreign Political Figures and Oligarchs in the Russian Federation
and
Russian Parastatal Entities**

January 29, 2018

Section 241 of the Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA) requires the Secretary of the Treasury, in consultation with the Director of National Intelligence and the Secretary of State, to submit to the appropriate congressional committees 180 days after enactment a detailed report on senior political figures and oligarchs in the Russian Federation (Section 241(a)(1)) and on Russian parastatal entities (Section 241(a)(2)). Pursuant to Section 241(b), the report shall be submitted in an unclassified form but may have a classified annex. This is the unclassified portion of the report.

Section 241(a)(1) – Senior Foreign Political Figures and Oligarchs in the Russian Federation

As required by Section 241(a)(1)(A) of CAATSA, the Department of the Treasury is providing in this unclassified report a list of senior foreign political figures and oligarchs in the Russian Federation, as determined by their closeness to the Russian regime and their net worth. For purposes of this unclassified portion of the report, this determination was made based on objective criteria related to individuals' official position in the case of senior political figures, or a net worth of \$1 billion or more for oligarchs.

To determine the list of senior political figures, the Department of the Treasury considered the definition in CAATSA Section 241(c)(2), which incorporates by reference the definition of "senior foreign political figure" in section 1010.605, title 31 of the Code of Federal Regulations. For purposes of this unclassified portion of the report, such names consist of: i) senior members of the Russian Presidential Administration; ii) members of the Russian Cabinet, Cabinet-rank ministers, and heads of other major executive agencies; iii) other senior political leaders, including the leadership of the State Duma and Federation Council, other members of the Russian Security Council, and senior executives at state-owned enterprises. These individuals are listed in Appendix 1 of this report.

To determine the list of oligarchs, the Department of the Treasury enumerated those individuals who, according to reliable public sources, have an estimated net worth of \$1 billion or more. Those individuals who meet this criterion are listed in Appendix 2 of this report.

The Department of the Treasury is also providing in a classified annex to this report additional information required pursuant to Section 241(a)(1). The classified annex may include individuals who are not included in Appendices 1 and 2 to this unclassified report, and such persons may hold a position below those included in the unclassified report or have a net worth below \$1 billion.

UNCLASSIFIED

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This report has been prepared and provided exclusively in response to Section 241 of CAATSA. It is not a sanctions list, and the inclusion of individuals or entities in this report, its appendices, or its annex does not and in no way should be interpreted to impose sanctions on those individuals or entities. Inclusion in this report also does not constitute the determination by any agency that any of those individuals or entities meet the criteria for designation under any sanctions program. Moreover, the inclusion of individuals or entities in this report, its appendices, or its classified annexes does not, in and of itself, imply, give rise to, or create any other restrictions, prohibitions, or limitations on dealings with such persons by either U.S. or foreign persons. Neither does inclusion on the unclassified list indicate that the U.S. Government has information about the individual's involvement in malign activities. Named individuals and entities who are separately subject to sanctions pursuant to sanctions programs established in U.S. law are denoted with an asterisk (*).

Section 241(a)(2) – Russian Parastatal Entities

CAATSA Section 241(a)(2)-(5) requires a report on Russian parastatal entities, including an assessment of their role in the economy of the Russian Federation; an overview of key U.S. economic sectors' exposure to Russian persons and entities; an analysis of the potential effects of imposing additional debt and equity restrictions on parastatal entities; and the possible impact of additional sanctions against oligarchs, senior political figures, and parastatals on the U.S. and Russian economies.

Russian parastatals have origins in the Soviet Union's command economy. After the dissolution of the Soviet Union, the Russian government conducted large-scale privatization of these entities; in the early 2000s, it began to renationalize large companies. The Russian government has responded to economic shocks, including the financial crisis in 2008 and the imposition of sanctions in 2014, by increasing its role in the economy and ownership of parastatals. As of 2016, Russian parastatals accounted for one-third of all jobs in Russia and 70 percent of Russia's GDP.

For purposes of this requirement, Russian parastatals are defined as companies in which state ownership is at least 25 percent and that had 2016 revenues of approximately \$2 billion or more. A list of such parastatals and the required analysis specified in Section 241(a)(2)-(5) are included in the classified annex of this report.

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Appendix A: List of Senior Political Figures**Presidential Administration**

1. Anton Vayno	Head, Presidential Administration
2. Aleksey Gromov*	First Deputy Head, Presidential Administration
3. Sergey Kiriyenko	First Deputy Head, Presidential Administration
4. Magomedsalam Magomedov	Deputy Head, Presidential Administration
5. Vladimir Ostrovenko	Deputy Head, Presidential Administration
6. Dmitriy Peskov	Deputy Head, Presidential Administration; Presidential Press Secretary
7. Vladislav Kitayev	Chief of Presidential Protocol
8. Andrey Belousov	Aide to the President
9. Larisa Brycheva	Aide to the President
10. Vladislav Surkov*	Aide to the President
11. Igor Levitin	Aide to the President
12. Vladimir Kozhin*	Aide to the President
13. Yuriy Ushakov	Aide to the President
14. Andrey Fursenko*	Aide to the President
15. Nikolay Tsukanov	Aide to the President
16. Konstantin Chuychenko	Aide to the President
17. Yevgeniy Shkolov	Aide to the President
18. Igor Shchegolev*	Aide to the President
19. Aleksandr Bedritskiy	Adviser to the President , Special Presidential Representative on Climate Issues
20. Sergey Glazyev*	Adviser to the President
21. Sergey Grigorov	Adviser to the President
22. German Klimenko	Adviser to the President
23. Anton Kobayakov	Adviser to the President
24. Aleksandra Levitskaya	Adviser to the President
25. Vladimir Tolstoy	Adviser to the President
26. Mikhail Fedotov	Adviser to the President, Chairman of the Presidential Council for Civil Society and Human Rights
27. Venyamin Yakovlev	Adviser to the President
28. Artur Muravyev	Presidential Envoy to the Federation Council
29. Garry Minkh	Presidential Envoy to the State Duma
30. Mikhail Krotov	Presidential Envoy to the Constitutional Court
31. Anna Kuznetsova	Presidential Commissioner for Children's Rights
32. Boris Titov	Presidential Commissioner for Entrepreneurs' Rights
33. Mikhail Babich	Plenipotentiary Representative to the Volga Federal District

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- | | |
|-------------------------|--|
| 34. Aleksandr Beglov | Plenipotentiary Representative to the Northwestern Federal District |
| 35. Oleg Belaventsev* | Plenipotentiary Representative to the North Caucasus Federal District |
| 36. Aleksey Gordeyev | Plenipotentiary Representative to the Central Federal District |
| 37. Sergey Menyaylo* | Plenipotentiary Representative to the Siberian Federal District |
| 38. Yuriy Trutnev | Deputy Prime Minister – Plenipotentiary Representative to the Far Eastern Federal District |
| 39. Vladimir Ustinov | Plenipotentiary Representative to the Southern Federal District |
| 40. Igor Kholmanskikh | Plenipotentiary Representative to the Urals Federal District |
| 41. Aleksandr Manzhosin | Head, Foreign Policy Directorate |
| 42. Vladimir Chernov | Head, Directorate for Interregional and Cultural Ties to Foreign Countries |
| 43. Oleg Govorun | Head, Directorate for Social and Economic Relations with the Commonwealth of Independent States, Abkhazia, and South Ossetia |

Cabinet of Ministers

- | | |
|-------------------------|---|
| 44. Dmitriy Medvedev | Prime Minister |
| 45. Igor Shuvalov | First Deputy Prime Minister |
| 46. Sergey Prikhodko | Deputy Prime Minister and Head of the Government Apparatus |
| 47. Aleksandr Khloponin | Deputy Prime Minister |
| 48. Vitaliy Mutko | Deputy Prime Minister |
| 49. Arkadiy Dvorkovich | Deputy Prime Minister |
| 50. Olga Golodets | Deputy Prime Minister |
| 51. Dmitriy Kozak* | Deputy Prime Minister |
| 52. Dmitriy Rogozin* | Deputy Prime Minister |
| 53. Mikhail Abyzov | Minister for Liaison with Open Government |
| 54. Aleksandr Tkachev | Minister of Agriculture |
| 55. Vladimir Puchkov | Minister of Civil Defense, Emergencies, and Natural Disasters |
| 56. Nikolay Nikiforov | Minister of Communications and Mass Media |
| 57. Mikhail Men | Minister of Construction, Housing, and Public Utilities |
| 58. Vladimir Medinskiy | Minister of Culture |
| 59. Sergey Shoygu | Minister of Defense |
| 60. Maksim Oreshkin | Minister of Economic Development |

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61. Olga Vasilyeva	Minister of Education and Science
62. Aleksandr Novak	Minister of Energy
63. Aleksandr Galushka	Minister of Far East Development
64. Anton Siluanov	Minister of Finance
65. Sergey Lavrov	Minister of Foreign Affairs
66. Veronika Skvortsova	Minister of Health
67. Denis Manturov	Minister of Industry and Trade
68. Vladimir Kolokoltsev	Minister of Internal Affairs
69. Aleksandr Kononov	Minister of Justice
70. Maksim Topilin	Minister of Labor and Social Protection
71. Sergey Donskoy	Minister of Natural Resources and Ecology
72. Lev Kuznetsov	Minister of North Caucasus Affairs
73. Pavel Kolobkov	Minister of Sports
74. Maksim Sokolov	Minister of Transportation

Other Senior Political Leaders

75. Valentina Matviyenko*	Chairwoman, Federation Council
76. Sergey Naryshkin*	Director, Foreign Intelligence Service (SVR)
77. Vyacheslav Volodin*	Chairman, State Duma
78. Sergey Ivanov*	Presidential Special Representative for the Environment, Ecology, and Transport
79. Nikolay Patrushev	Secretary, Security Council
80. Vladimir Bulavin	Head, Federal Customs Service
81. Valeriy Gerasimov	First Deputy Minister of Defense and Chief of the General Staff
82. Igor Korobov*	Chief, Main Intelligence Directorate General Staff (GRU), Ministry of Defense
83. Rashid Nurgaliyev	Deputy Secretary, Security Council
84. Georgiy Poltavchenko	Governor of Saint Petersburg
85. Sergey Sobyenin	Mayor of Moscow
86. Yuriy Chayka	Prosecutor General
87. Aleksandr Bastrykin*	Head, Investigative Committee
88. Viktor Zolotov	Director, Federal National Guard Service
89. Dmitriy Kochnev	Director, Federal Protection Service
90. Aleksandr Bortnikov	Director, Federal Security Service (FSB)
91. Andrey Artizov	Head, Federal Archive Agency
92. Yuriy Chikhanchin	Head, Financial Monitoring Federal Service
93. Aleksandr Linets	Head, Presidential Main Directorate for Special Programs
94. Aleksandr Kolpakov	Head, Presidential Property Management Directorate

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95. Valeriy Tikhonov	Head, State Courier Service
96. Aleksey Miller	Chief Executive Officer, Gazprom
97. Igor Sechin*	Chief Executive Officer, Rosneft
98. German Gref	Chief Executive Officer, Sberbank
99. Oleg Belozеров	General Director, Russian Railways
100. Andrey Kostin	Chairman-Management Board, VTB
101. Sergey Chemezov*	Chief Executive Officer, Rostec
102. Oleg Budargin	Chief Executive Officer, Rosseti
103. Boris Kovalchuk	Chief Executive Officer, Inter RAO
104. Aleksey Likhachev	General Director, Rosatom
105. Nikolay Tokarev	Chief Executive Officer, Transneft
106. Andrey Akimov	Chief Executive Officer, Gazprombank
107. Nail Maganov	General Director, Tatneft
108. Vitaliy Savelyev	Chief Executive Officer, Aeroflot
109. Andrey Shishkin	Chief Executive Officer, ANK Bashneft
110. Yuriy Slyusar	Chief Executive Officer, United Aircraft Corporation
111. Nikolay Shulginov	Chief Executive Officer, RusHydro
112. Sergey Gorkov	Chief Executive Officer, Vneshekonombank
113. Sergey Ivanov (Jr)	Chief Executive Officer, ALROSA
114. Roman Dashkov	Chief Executive Officer, Sakhalin Energy

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Appendix B: List of Oligarchs

1. Aleksandr Abramov
2. Roman Abramovich
3. Araz Agalarov
4. Farkhad Akhmedov
5. Vagit Alekperov
6. Igor Altushkin
7. Aleksey Ananyev
8. Dmitriy Ananyev
9. Vasiliy Anisimov
10. Roman Avdeyev
11. Petr Aven
12. Yelena Baturina
13. Aleksey Bogachev
14. Vladimir Bogdanov
15. Leonid Boguslavskiy
16. Andrey Bokarev
17. Oleg Boyko
18. Nikolay Buynov
19. Oleg Deripaska
20. Aleksandr Dzhaparidze
21. Leonid Fedun
22. Gleb Fetisov
23. Mikhail Fridman
24. Aleksandr Frolov
25. Filaret Galchev
26. Sergey Galitskiy
27. Valentin Gapontsev
28. Sergey Gordeyev
29. Andrey Guryev
30. Yuriy Gushchin
31. Mikhail Gutseriyev
32. Sait-Salam Gutseriyev
33. Zarakh Iliyev
34. Dmitriy Kamenshchik
35. Vyacheslav Kantor
36. Samvel Karapetyan
37. Yevgeniy Kasperskiy
38. Sergey Katsiyev
39. Suleyman Kerimov
40. Igor Kesayev
41. Danil Khachaturov
42. German Khan
43. Viktor Kharitonin
44. Aleksandr Klyachin
45. Petr Kondrashev

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46. Andrey Kosogov
47. Yuriy Kovalchuk*
48. Andrey Kozitsyn
49. Aleksey Kuzmichev
50. Lev Kvetnoy
51. Vladimir Lisin
52. Anatoliy Lomakin
53. Ziyavudin Magomedov
54. Igor Makarov
55. Iskander Makhmudov
56. Aleksandr Mamut
57. Andrey Melnichenko
58. Leonid Mikhelson
59. Yuriy Milner
60. Boris Mints
61. Andrey Molchanov
62. Aleksey Mordashov
63. Vadim Moshkovich
64. Aleksandr Nesis
65. God Nisanov
66. Aleksandr Ponomarenko
67. Sergey Popov
68. Vladimir Potanin
69. Mikhail Prokhorov
70. Dmitriy Pumpyanskiy
71. Megdet Rakhimkulov
72. Andrey Rappoport
73. Viktor Rashnikov
74. Arkadiy Rotenberg*
75. Boris Rotenberg*
76. Dmitriy Rybolovlev
77. Ayrat Shaymiyev
78. Radik Shaymiyev
79. Kirill Shamalov
80. Yuriy Shefler
81. Albert Shigabutdinov
82. Mikhail Shishkhanov
83. Leonid Simanovskiy
84. Andrey Skoch
85. Aleksandr Skorobogatko
86. Rustem Sulteyev
87. Aleksandr Svetakov
88. Gennadiy Timchenko*
89. Oleg Tinkov
90. Roman Trotsenko
91. Alisher Usmanov

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- 92. Viktor Vekselberg
- 93. Arkadiy Volozh
- 94. Vadim Yakunin
- 95. Vladimir Yevtushenkov
- 96. Gavril Yushvayev

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Exhibit H

DE44

Draft Red Notice Application Form



Person

Identity particulars

Status: Wanted
 Purpose: Arrest
 Family name: **BOYKO**
 Family name in original script or Chinese Telegraphic Code:
 Family name at birth:
 Forename(s): **OLEG**
 Forename(s) in original script or Chinese Telegraphic Code:
 Date of birth: 28/09/1964 Sex: Male
 Place of birth: Russia
 Nationalities: Russia (Confirmed)
 Caution:
 Other:

Attachments

>> Photographs (0)
 >> Fingerprints (0)
 >> DNA (0)
 >> Dental information (0)

Mr. m/w Doc

Aliases

Nicknames:

Details

Marital status:
 Father's family name:
 Father's forename(s):
 Mother's maiden name:
 Mother's forename(s):
 Occupation:
 Languages spoken: Russian
 Regions/Countries likely to be visited: Russia
 Additional information:

Identity documents

	Nationality	Type	Number	Date of issue	Expiry date	Issued in (Country)	Region and/or town
1	Russia	Passport	4510524951				

Identification material

Dental information:

Blood group:

Jewellery:

Clothing:

Other personal effects:

Physical description

Height (cm):

Eyes:

Build:

Weight (kg):

Hair:

Distinguishing marks and characteristics:

Addresses

E-mail addresses:

Case

Facts of the case

NCB case reference:

Offence code(s):

Date:

Summary in English:

CYP/INT/540(257/19)AI

INTERPOL General Secretariat case reference: 2019/68079-1

COMMERCIAL FRAUD | FRAUD | THEFT

From 01/01/2006 To 31/12/2006 Place: Cyprus

The complainant, Russian National, is the owner of the company ORLANDO HEIGHTS LIMITED. The shareholder of the a/m company is the company FELDMANS MANAGEMENT (OVERSEAS) LTD, which is also the trustee of the complainant. In 2006 the subject convinced the complainant to be a part of a

construction project as an investor. During their cooperation, between the years 2006 -2012 the subject manage to deceive the representative of the company FELDMANS MANAGEMENT (OVERSEAS) LIMITED, to transfer shares of a company belonging to a company of the complainant to his name in violation of the declaration of trust which was signed by the subject as well as the complainant. Furthermore, during the same time period the subject while he was one of the trustees, by fraud, he manage to dispose property of the trust-fund total worth of 141.430.000 USD. All the above were made without the knowledge and the consent of the complainant.

Summary in French:

Summary in Spanish:

Summary in Arabic:

Additional facts of the case:

Action to be taken

Locate and arrest with a view to extradition: Assurances are given that extradition will be sought upon arrest of the person, in conformity with national laws and/or the applicable bilateral and multilateral treaties.

Provisional arrest: This request is to be treated as a formal request for provisional arrest, in conformity with national laws and/or the applicable bilateral and multilateral treaties.

Judicial information

Information concerning a

Judicial decision 1/1

Charge(s) on which convicted:

Law covering the offence(s):

Maximum penalty possible:

Fugitive wanted for prosecution

1. Stealing of Shares 2. Trustees fraudulently disposing of trust property.

1, Chapter 154, Article 255 2, Chapter 154, Article 310 and Article 5(1)(E)(VII)

10 Years imprisonment

Details:

Time-limit for prosecution or expiry

date of arrest warrant or judicial

decision having the same effect:

Arrest warrant or judicial
decision having the same effect

No. No Number issued on 13/06/2019 by Nicosia District Court, Cyprus

Name of signatory:

Attached arrest warrant: No

Please send any information about this person to INTERPOL

NCB message reference: CYP/INT/540(257/19)AI

Of: 28/06/2019

Please specify whether you authorize the General Secretariat to disclose No
to the public extracts of the information contained in your notice
application:

Reasons justifying Internet publication:

Signature

Name of the officer in charge of this PC 4100 A. Ioannidou
matter:

Telephone and/or fax numbers of tel.: +35722607841, fax.: +35722607898
the officer in charge of this matter:

E-mail address: ncb.nicosia@cy.igcs.int

Exhibit I

AG denies corruption charges



File photo: Attorney-General George Savvides

Tuesday 30 January | 19:28

8 Comments

By [Andria Kades](#)

Share:



Attorney General George Savvides strongly denied corruption charges on Tuesday after a lawyer accused his office of collaborating with a billionaire Russian oligarch to allow an allegedly illegal \$113.4 million deal go unpunished.

In a lengthy letter to President Nikos Christodoulides, lawyer Efstathios Efstathiou sought to report the AG and his deputy, saying they had “cast a shield of protection” around Russian oligarch Oleg Boyko.

Prompting the complaint is Efstathiou’s claim that \$113.4 million worth of shares were stolen from his client Ilya Alekseevitch Surkov and illegally transferred to Boyko through Cyprus-registered companies.

**CyprusMail**
Established 1945

Q SEARCH

Shares in a Russian man

This was achieved after Boyko allegedly used false representations to illegally transfer all the shares that Orlando Heights Ltd had in Greencat Services Ltd, to one of his own interests Finstroy Ltd, the last two of which are registered in Cyprus.

As such, he ended up holding 80 per cent of the assets Orlando Heights had in Moscow’s Altufievo Mall, without Surkov knowing about it, the lawyer claims.

Nonetheless, criminal charges against Boyko were dropped by the legal service, citing insufficient witness material for a criminal prosecution in Cyprus.

A few million to ‘sort out’ the case

Efstathiou cried foul, saying this went against the public interest, He also filed three separate complaints to the anti-corruption authority.

The authority's head Charis Poyiadjis told the *Cyprus Mail* "we did not find any evidence of corruption."

Efstathiou claimed Boyko said he spent three million in Cyprus to "sort out his case" and therefore had "nothing to be afraid of".

The AG hit back, rubbing the claims, saying the lawyer was using every means possible to exert pressure that could ultimately lead to decisions that would benefit his client.

Fake representations

The alleged offences took place in 2012.

Efstathiou told the *Cyprus Mail* the two businessmen had a deal allowing shares of 64,000m² of property at the mall to be transferred but 126,000m² ended up being transferred.

This was a result of false representations by Boyko's partner in Cyprus, that convinced the trustee to sign the transfer, he claimed.

International arrest warrant

According to Efstathiou, the oligarch avoided questioning for four years, prompting police to issue a Red Notice international arrest warrant, where Boyko became a wanted man in Cyprus.

Efstathiou claims after the arrest warrant, Boyko sent a team of his lawyers to meet with police and the legal service.

For unknown reasons, the arrest warrant was then scrapped.

The private lawsuit filed by Efstathiou over the case was also suspended following orders by the AG, citing insufficient witness material.

Sketchy background

Both businessmen implicated in the story which Efstathiou described as “the largest in Cyprus’ criminal history” have made headlines across the globe.

Surkov was wanted in Russia for alleged fraud, and is reported to hold a Greek passport. Though he was jailed in Russia, Surkov eventually made it to the UK.

Russian authorities sought to extradite him, however a British court ruled he would be in danger of persecution and as such, was allowed to remain in the UK on political asylum grounds due to humanitarian protection.

Boyko had been sanctioned by Canada and Australia following Russia’s invasion of Ukraine, though Canada lifted the sanctions following a lawsuit.

The US Senate Intelligence Committee reportedly said Boyko had “concerning ties” to the Russian state and criminality.

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attorney general

featured

george savvides

sanctions

Share:



Exhibit J

ALEXEY KONDRATIEV
3045 16th Sideroad,
King City, Ontario L7B1A3
Canada

Pro Se Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Oleg Boyko, et al.

Plaintiffs,

v.

Alexey Kondratiev, et al.

Defendants.

No. CV-23-01186-PHX-DLR

**DEFENDANT'S FIRST SET OF
REQUESTS FOR PRODUCTION
TO THE PLAINTIFF OLEG
BOYKO**

Pursuant to Federal Rules of Civil Procedure ("FRCP") 26 and 34, Defendant Alexey Kondratiev hereby requests that the Plaintiff Oleg Boyko produces for inspection and copying the following documents to 3045 16th Sideroad, Ontario, Canada L7B 1A3, in accordance with the Definitions and Instructions set forth below. Responses to these requests must be produced within thirty (30) days after service in accordance with FRCP 34.

DEFINITIONS

Except as specifically defined below, the terms used in these requests shall be construed and defined in accordance with the FRCP, wherever applicable. Any terms not defined shall be given their ordinary meaning.

1 1. The term “Answer” means the Answer filed by You on August 9, 2023, in the
2 above-captioned action (ECF No. 24).

3 2. The term “Communication(s)” means the transmittal, transfer, offer, or
4 exchange of information (in the form of facts, ideas, inquiries, or otherwise) by any
5 means, and shall include, without limitation, text messages in any format (e.g., SMS,
6 MMS, iMessage, etc.).
7

8 3. The term “Complaint” means the complaint filed on June 27, 2023, in the
9 above-captioned action (ECF No. 1).
10

11 4. The terms “Concerning,” “Reflecting,” “Regarding,” and “Related To” mean
12 analyzing, describing, discussing, constituting, containing, considering, embodying,
13 evaluating, mentioning, memorializing, supporting, collaborating, demonstrating,
14 proving, evidencing, showing, refuting, disputing, rebutting, controverting, contradicting,
15 pertaining to, made in connection with or by reason of, or derived or arising therefrom, or
16 being in any way legally, logically, or factually concerned with the matter described,
17 referred to, or discussed.
18

19 5. The term “Document(s)” is synonymous in meaning and scope to the term
20 “document” as used in FRCP 34, including “writings” and “recordings” as defined in
21 Federal Rule of Evidence 1001. It includes, but it not limited to, all written, printed,
22 typed, recorded or graphic matter, however produced or reproduced, of every kind and
23 description, in whatever form (e.g., final and draft versions) in your actual or constructive
24 possession, custody, care or control, including without limitation all writings,
25 correspondence, e-mails, letters, telegrams, notes, mailgrams, cellphone texts, agenda,
26
27
28

1 memoranda, inter-office communications, reports, forecasts, projects, analyses, working
2 papers, charts, requests for authorization, expense account reports, charge or credit
3 account vouchers, calendars, appointment books, diaries, drawings, graphs, photographs,
4 sound reproduction tapes, data compilations from which information can be obtained or
5 can be translated through detection devices into reasonably useable form, computer
6 inputs or outputs, or any other tangible thing. The term “Document(s)” includes not only
7 originals, but also any copies or reproductions upon which notations in writing, print, or
8 otherwise have been made which do not appear in the original.

11 6. The term “Person” means any individual, corporation, partnership, firm,
12 association, government agency, or other organization recognizable at law, including its
13 present and former officers, members, managers, directors, partners, employee,
14 independent contractors, agents, accountants, representatives, and attorneys.

16 7. The terms “You” and “Your” mean Defendant Alexey Kondratiev and his
17 agents, employees, representations, successors, predecessors, attorneys, and/or anyone
18 acting or purporting to act on his behalf.

20 INSTRUCTIONS

21
22 1. You shall produce materials and serve responses and any objections on the
23 Defendant within 30 days after service of these requests for production.

24 2. Pursuant to FRCP 34(b)(2)(B) and (C), if you object to any part of a request, set
25 forth the basis for your objection and respond to all parts of the request to which you do
26 not object. All objections must be noted with specificity. Any ground not stated in a
27 timely objection is waived.
28

1 3. With respect to any document withheld on a claim of privilege or work product
2 protection, provide a written privilege log identifying each document individually and
3 containing all information required by FRCP 26(b)(5), including a description of the
4 basis of the claimed privilege and all information necessary for Defendant to assess the
5 claim of privilege.
6

7 4. In accordance with the FRCP, the scope of discovery sought through these
8 requests for production extends to all relevant and non-privileged materials that might
9 reasonably lead to the discovery of admissible evidence. You should produce all
10 documents available to you or subject to your access or control that are responsive to the
11 requests for production. This includes documents in your actual or constructive
12 possession or control, as well as any non-privileged information in the actual or
13 constructive possession or control of your attorneys, investigators, experts, agents, and
14 any other persons acting on your behalf.
15
16
17

18 5. Documents are to be produced as they are kept in the ordinary course of
19 business. Accordingly, documents should be produced in their entirety, without
20 abbreviation, redaction, or expurgation; file folders with tabs or labels identifying
21 documents responsive to this request should be produced intact with the documents; and
22 documents attached to each other should not be separated.
23

24 6. Subject to any Electronically Stored Information order subsequently entered in
25 this case, all documents are to be produced in electronic form pursuant to these
26 instructions. All documents, including emails, should be produced in single page .TIFF
27 format, showing comments and track changes where applicable, with text extract and
28

1 database load files containing standard fielded information and metadata. .TIFF images
2 shall be placed in an Images folder with any given subfolder not to exceed 5,000 images
3 per folder and accompanied by an .opt and .dat load files placed in a Data folder. If files
4 are produced in native format, those natively-produced documents should be
5 accompanied by a placeholder and OCR/extracted test file. Each page of a document
6 should be assigned a unique production number (aka Bates number) electronically
7 “burned” onto the image at a location that does not unreasonably conceal or interfere with
8 information on the document. The Bates numbering convention should be consistent
9 across the production, contain no special characters, and be numerically sequential within
10 a given document. Attachments to documents should be assigned numbers that directly
11 follow in sequential order the Bates numbers on the documents to which they were
12 attached. If a number or set of numbers is skipped, the skipped number or set of numbers
13 should be noted, for example with a placeholder.

14
15
16
17
18 7. If there are no documents responsive to a particular request, so indicate in your
19 response.

20
21 8. If any otherwise responsive document was, but is no longer, in existence or in
22 your possession, custody, or control, identify the type of information contained in the
23 document, its current or last known custodian, the location/address of such document,
24 and the identity of all persons having knowledge or who had knowledge of the document,
25 as well as describe in full the circumstances surrounding its destruction, loss, or other
26 disposition from your possession or control.

27
28 9. These requests for production are continuing in nature, up to and during trial.

1 Materials sought by these requests for production that become available after you serve
2 your responses must be disclosed to the Defendant by supplementary response or
3 responses.
4

5 10. Pursuant to FRCP 26(e), you are under a duty to promptly supplement or
6 correct your responses to these requests for production if you learn that an answer is in
7 some material respect incomplete or incorrect. If you expect to obtain further information
8 or expect the accuracy of a response given to change between the time responses are
9 served and the time of trial, you should state this fact in each response. Supplementary
10 answers are to be served upon the Defendant as soon as practicable after you receive this
11 new information, but, in any event, no later than 14 days after its receipt.
12
13

14 11. If you contend that it would be unreasonably burdensome to obtain and
15 provide all of the documents called for in response to any document request or any
16 subsection thereof, then in response to the appropriate document request: (a) produce all
17 such documents as are available to you without undertaking what you contend to be an
18 unreasonably burdensome effort; (b) describe with particularity the efforts made by you
19 or on your behalf to produce such documents, including identification of persons
20 consulted, description of files, records and documents reviewed, and identification of
21 each person who participated in the gathering of such documents, with specification of
22 the amount of time spent and the nature of work done by such person; and (c) state with
23 particularity the grounds upon which you contend the additional efforts to produce such
24 documents would be unreasonably burdensome.
25
26
27

28 12. The singular shall be read to include the plural and vice versa, the gender of a

1 pronoun (masculine, feminine, or neutral) shall not exclude the other genders, the present
2 tense shall be read to include the past tense and vice versa, the term “each” shall be read
3 to include the term “every” and vice versa, the term “any” shall be read to include the
4 term “all” and vice versa, and the term “and” shall be read to include the term “or” and
5 vice versa, so as to encompass the broadest possible interpretation for each request.
6

7 **REQUESTS FOR PRODUCTION**

8 **REQUEST FOR PRODUCTION NO. 1:**

9
10 All Documents, including communications, that confirm that Mr. Boyko is a
11 citizen of Italy and resident of Switzerland as stated in paragraph 6 of the Complaint.
12

13 **REQUEST FOR PRODUCTION NO. 2:**

14 All Documents, including communications, that confirm that Mr. Kondratiev
15 provided services to the corporations owned by Mr. Boyko as stated in paragraph 13 of
16 the Complaint.
17

18 **REQUEST FOR PRODUCTION NO. 3:**

19 All Documents, including communications, that confirm that Mr. Kondratiev “also
20 added Boyko as a cross-defendant” to the litigation with Arcadia as stated in paragraph
21 15 of the Complaint.
22

23 **REQUEST FOR PRODUCTION NO. 4:**

24 All Documents, including communications, that confirm that Mr. Kondratiev
25 “repeatedly accused Boyko of alleged criminal conduct and engaged in efforts to injure
26 Boyko’s business reputation” as stated in paragraph 17 of the Complaint.
27

28 **REQUEST FOR PRODUCTION NO. 5:**

1 All Documents, including communications, that confirm that Mr. Kondratiev has
2 extorted monetary payments from Mr. Boyko as stated in paragraph 17 of the Complaint.

3 **REQUEST FOR PRODUCTION NO. 6:**

4
5 All Documents, including communications, that confirm that Mr. Kondratiev
6 registered and “repeatedly altered” <olegvboyko.website> as stated in the paragraph 18
7 of the Complaint.

8 **REQUEST FOR PRODUCTION NO. 7:**

9
10 All Documents, including communications, regarding allegations of Mr. Boyko
11 engagements in illegal activity and affiliations with organized crime as stated in
12 paragraph 19 of the Complaint.

13 **REQUEST FOR PRODUCTION NO. 8:**

14
15 All Documents, including communications, regarding Mr. Boyko’s involvement
16 with National Credit Bank and OLBI-USA as stated in paragraph 19 of the Complaint.

17 **REQUEST FOR PRODUCTION NO. 9:**

18
19 All Documents, including communications, regarding Mr. Boyko’s financing of
20 Hollywood movies as stated in paragraph 19 of the Complaint.

21 **REQUEST FOR PRODUCTION NO. 10:**

22
23 All Documents, including communications, that prove that Mr. Kondratiev “has
24 registered, trafficked in, and/or used” <olegvboyko.website> with the intent to profit
25 from the Boyko Mark as stated in paragraph 32 of the Complaint.

26 **REQUEST FOR PRODUCTION NO. 11:**

27
28 All Documents, including communications, that prove that Mr. Kondratiev

1 “registered, trafficked in, and/or used the alleged Defendant Domain name to divert
2 customers from the legitimate https://oleg-boyko.com website” as stated in paragraph 37
3 of the complaint.

4
5 **REQUEST FOR PRODUCTION NO. 12:**

6 All Documents, including communications, that prove that the “registrant of the
7 alleged Defendant Domain name registered the <olegvboyko.website> with intent to
8 divert consumers seeking information about Boyko online away from Boyko’s legitimate
9 site https://oleg-boyko.com for commercial gain” as stated in paragraphs 40-41 of the
10 Complaint.

11
12 **REQUEST FOR PRODUCTION NO. 13:**

13 All Documents, including communications, regarding the claim that any potential
14 customer has been diverted from the “legitimate” web site as stated in paragraphs 40-41
15 of the Complaint.

16
17 **REQUEST FOR PRODUCTION NO. 14:**

18 All Documents, including communications, that indicate that Mr. Kondratiev
19 intended to profit or profited from the alleged Defendant Domain name as stated in
20 paragraph 44-45 of the Complaint.

21
22 **REQUEST FOR PRODUCTION NO. 15:**

23 All Documents, including communications, that indicate that Mr. Kondratiev
24 received any monetary or other benefits from the alleged Defendant Domain name.

25
26 **REQUEST FOR PRODUCTION NO. 16:**

27 All Documents, including communications, that prove that the Plaintiff Finstar has
28

1 suffered damage and/or irreparable harm as stated in paragraph 47.

2 **REQUEST FOR PRODUCTION NO. 17:**

3 All Documents, including communications, that prove that Mr. Kondratiev has
4 used the alleged Defendant Domain name in bad faith.

6 **REQUEST FOR PRODUCTION NO. 18:**

7 All Documents, including communications, that confirm that Mr. Boyko has
8 sustained monetary damages and irreparable injury in relation to the alleged Defendant
9 Domain name as stated in paragraph 57.

11 **REQUEST FOR PRODUCTION NO. 19:**

12 All Documents, including communications, that indicate the number of potential
13 customers, current customers or other people that have been diverted from the allegedly
14 “legitimate” site <https://oleg-boyko.com> to the alleged Defendant Domain name.

16 **REQUEST FOR PRODUCTION NO. 20:**

17 All Documents, including communications, that confirm that Mr. Boyko, directly
18 or indirectly, owned an apartment in Trump Tower as stated on the web site with the
19 alleged Defendant Domain name.

21 **REQUEST FOR PRODUCTION NO. 21:**

22 All Documents, including communications, that prove or disprove information
23 contained in Sections A, B, C and D on the web site with the alleged Defendant Domain
24 name accessible at URL <http://www.olegvboyko.website/review.html>

27 **REQUEST FOR PRODUCTION NO. 22:**

28 All Documents, including communications, regarding relationship with

1 Trinchler/Nahman gambling ring as stated on the web site with the alleged Defendant
2 Domain name.

3 **REQUEST FOR PRODUCTION NO. 23:**
4

5 All Documents, including communications, regarding Mr. Boyko's relationship
6 with 4finance as stated on the web site using the alleged Defendant Domain name.
7

8
9 Dated November 6, 2023

10 By: /s/ Alexey Kondratiev
11 Alexey Kondratiev
12 Pro Se *Defendant*
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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November 2023, I served a copy of Defendant's First Set of Requests for Production on the Attorneys for Plaintiffs Oleg Boyko and Finstar-Holding LLC via electronic mail – from my e-mail address <akondratiev@mac.com> to the following e-mail addresses:

<astolyar@loeb.com>

<dbeddingfield@loeb.com>

<jmargolis@loeb.com>

<amy@fennemorelaw.com>

<bgilmore@fennemorelaw.com>

By: /s/ Alexey Kondratiev
Alexey Kondratiev

Exhibit K

ALEXEY KONDRATIEV
3045 16th Sideroad,
King City, Ontario L7B1A3
Canada

Pro Se Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Oleg Boyko, et al.
Plaintiffs,
v.
Alexey Kondratiev, et al.
Defendants.

No. CV-23-01186-PHX-DLR

**DECLARATION OF ALEXEY
KONDRATIEV IN SUPPORT OF
HIS RESPONSE TO THE MOTION
FOR PARTIAL SUMMORY
JUDJEMENT**

DECLARATION OF ALEXEY KONDRATIEV

I, Alexey Kondratiev, hereby declare and swear as follows:

1. I am an individual residing in King City, Ontario, Canada. I make this Declaration in support of my response to the motion for Preliminary Injunction that was brought forward by the Plaintiffs.

2. I graduated from Moscow Aviation Institute, a Russian technical university, in 1987 with a master's degree in computer science and I have over 35 years of professional experience in this field.

3. Presently, I am a Senior Software Engineer at Advanced Micro Devices, Inc.

1 (“AMD”) where I have been working full-time since October 16, 2012. AMD is an
2 American multinational corporation and semiconductor company based in Santa Clara,
3 California, that develops computer processors and related technologies for business and
4 consumer markets.

6 4. I believe that my training and experience allow me to make the following
7 statements as an expert.

9 5. On or about Mach 21, 2024, I received a file named
10 “BOYKO00000963.mbox” amongst other files produced by the Plaintiffs in their response
11 to the Second Request for Production.

12 6. I have personally examined this file using computer tools and am qualified
13 to make the following statements regarding this file.

15 7. The file “BOYKO00000963.mbox” is a text file with the size of 61.8
16 Megabytes. Any attempt to print this file would yield more than fifteen thousand pages.

18 8. Upon visual inspection of this file with a text editor, I can conclude that this
19 file contains meta-data generated by Google from a mailbox that belongs to the account
20 “billyzodiac100@gmail.com”.

22 9. The file is organized into records that are separated by two empty lines. Each
23 record corresponds to an email message that is stored in the mailbox and has a unique
24 identifier. The records do not contain subject lines or message contents. Instead, the records
25 only contain the “From:” field, the “Reply-to:” field, the date of each message and other
26 meta-data that can identify an email exchange server, spam filters, content language, etc.

28 10. Using computer tools, I counted 19,953 unique message identifiers that

1 correspond to the same number of messages contained in that mailbox. The first message
2 was created on August 11, 2014 and the last message was created on November 9, 2023.
3 The even distribution of the messages across those years is consistent with normal business
4 practices. There were no indications that this mailbox was specifically created for one-time
5 use in order to register a domain in or around 2017.
6

7 11. I searched for the following case-insensitive text strings in a text editor used
8 to open the file for and found no matches for “alexey”, “kondratiev”, “akondratiev”, or
9 “akond”.
10

11 12. I have searched my own computers and found no records matching
12 “billyzodiac100@gmail.com”. To my best knowledge, I have never communicated with
13 this account and am not aware of any person who could be associated with it.
14
15

16 I declare under penalty of perjury under the laws of the United States and the State
17 of Arizona that the foregoing is true and correct.
18

19 Executed on June 5, 2024, at King City, Ontario, Canada
20

21 
22

23 Alexey Kondratiev
24
25
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